

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(a)

WONG FLEMING, P.C.

Daniel C. Fleming, NJ Bar No. 18631986
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Counsel for Creditor and party-in-interest
ORR Protection Systems, Inc.

In re Powin, LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 25-16137 (MBK)

(Jointly Administered)

APPLICATION FOR ADMISSION PRO HAC VICE OF LAURA BRYMER

The undersigned hereby seeks an Order granting the admission pro hac vice of Laura Brymer of the law firm Fultz Maddox Dickens PLC (“Fultz Maddox”), to practice before this Court in connection with the above-captioned proceeding. This application (the “Application”) is submitted pursuant to rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey.

Unless requested by other parties, no oral argument is requested. A proposed form of Order is attached. In support of the Application, the Applicant hereby represents as follows:

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin Project LLC [1583]; (ii) Powin, LLC [0504]; (iii) PEOS Holdings, LLC [5476]; (iv) Powin China Holdings 1, LLC [1422]; (v) Powin China Holdings 2, LLC [9713]; (vi) Charger Holdings, LLC [5241]; (vii) Powin Energy Ontario Storage, LLC [8348]; (viii) Powin Energy Operating Holdings, LLC [2495]; (ix) Powin Energy Operating, LLC [6487]; (x) Powin Energy Storage 2, Inc. [9926]; (xi) Powin Energy Ontario Storage II LP, [5787]; and (xii) Powin Canada B.C. Ltd. [2239]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

1. I am an attorney with Wong Fleming, P.C., which maintains an office at 821 Alexander Road, Suite 200, Princeton, NJ 08540. Wong Fleming has been retained to serve as counsel to creditor ORR Protection Systems, Inc. in connection with the above-captioned proceedings.

2. I am an attorney admitted to practice in the following jurisdictions:

COURT	YEAR OF ADMISSION	ADDRESS FOR OFFICE MAINTAINING ROLL OF MEMBERS
New Jersey Bar ID: 18631986	1986	The New Jersey Law Center One Constitution Square New Brunswick, NJ 08901-1520
District of Columbia Bar ID: 390604	1985	The District of Columbia Bar 1101 K Street, NW Suite 200 Washington, DC 20005
Maryland Bar ID: 8501010195	1985	Maryland State Bar Association 520 W. Fayette Street Baltimore, Maryland 21201
New York Bar ID: 2993343	1999	New York State Bar Association 1 Elk Street Albany, NY 12207
Ohio Bar ID: 94117	2016	Ohio State Bar Association 1700 Lake Shore Drive Columbus, OH 43204
Pennsylvania Bar ID: 80126	1997	Pennsylvania Bar Association 100 South Street Harrisburg, PA 17101
California Bar ID: 314283	2017	State Bar of California 180 Howard Street San Francisco, CA 94105
USDC District of New Jersey	1986	Attorney Admissions Office: United States District Court Clarkson S. Fisher Federal Building and United States Courthouse Attn: Attorney Admissions Office 402 East State Street, Room 2020 Trenton, NJ 08608
USDC District of Maryland	1988	United States District Court District of Maryland 101 West Lombard Street Baltimore, MD 21201 Attn: Attorney Information

USDC Southern District of New York	1997	United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 Attn: Attorney Services
USDC Eastern District of New York	2012	2012 United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201
USDC Western District of New York	2016	Clerk of Court, WDNY US District Court 100 State Street, Rm. 2120 Rochester, NY 14614
USDC Northern District of New York	2017	US District Court Northern District of New York James T. Foley U.S. Courthouse Suite 509 445 Broadway Albany, NY 12207
USDC Eastern District of Pennsylvania	2000	United States District Court Eastern District of Pennsylvania James A. Byrne U.S. Courthouse 601 Market Street Philadelphia, PA 19106
USDC Middle District of Pennsylvania	2020	US District Court Middle District of Pennsylvania Ronald Reagan Federal Bldg. & U.S. Courthouse 228 Walnut Street P.O. Box 983 Harrisburg, PA 17108
USDC Eastern District of Michigan	2014	U.S. District Court Eastern District of Michigan 231 W. Lafayette Blvd. Detroit, MI 48226
USDC District of Colorado	2013	U.S. District Court District of Colorado Alfred A. Arraj United States Courthouse 901 19th Street Denver, CO 80294-3589
USDC Northern District of Ohio	2017	U.S. District Court Northern District of Ohio 20161 Carl B. Stokes U.S. Court House 801 West Superior Avenue Cleveland, OH 44113-1830
USDC Southern District of Ohio	2018	U.S. District Court Southern District of Ohio Potter Stewart U.S. Courthouse 100 East Fifth Street Cincinnati, OH 45202

USDC Central District of California	2018	U.S. District Court Central District of California First Street U.S. Courthouse 350 W. 1stStreet Suite 4311 Los Angeles, CA 90012-4565
USDC Eastern District of California	2017	U.S. District Court Eastern District of California Robert E. Coyle U.S. Courthouse 2500 Tulare Street Fresno, CA 93921
USDC Northern District of California	2018	U.S. District Court Northern District of California Phillip Burton Federal Building & U.S. Courthouse 450 Golden Gate Avenue San Francisco, CA 94102
USDC Eastern District of Missouri Federal Bar No. 18631986N	2018	United States District Court Eastern District of Missouri Thomas F. Eagleton Courthouse 111 South 10th Street, Suite 3.300 St. Louis, MO 63102
USDC Eastern District of Wisconsin	2016	United States District Court Eastern District of Wisconsin U.S. Federal Building and Courthouse 517 E. Wisconsin Avenue Milwaukee, WI 53202
USDC Western District of Wisconsin	2019	U.S. District Court Western District of Missouri 120 N. Henry Street Madison, WI 53703
USDC Southern District of Illinois	2018	U.S. District Court Southern District of Illinois 301 West Main Street Benton, IL 62812
USDC Northern District of Illinois	2018	United States District Court Northern District of Illinois, Eastern Division Everett McKinley Dirksen U.S. Courthouse 219 South Dearborn Street Chicago, IL 60604
USDC Southern District of Indiana	2014	United States District Court Southern District of Indiana Birch Bayh Federal Building & U.S. Courthouse 46 East Ohio Street Indianapolis, IN 46204

3. I submit this Application, pursuant to Civ. Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of Bankruptcy Practice for the United States Bankruptcy Court for the District of New Jersey, in support of an Order Approving Admission, Pro Hac Vice, of Laura Brymer, Esq.

4. Ms. Brymer is an associate of Fultz Maddox Dickens PLC based at 101 South Fifth Street, 27th Floor, Louisville, KY 40202-3116.

5. Attached is a certification of Ms. Brymer in which she certifies that she is, and has been, a member in good standing of the bars of the states of Kentucky since 2012 and Indiana since 2013. Ms. Brymer also certifies that she is a member of the bars of the United States District Courts which are included in her supporting certification.

6. Additionally, Ms. Brymer certifies that she is, and has remained, a member in good standing of said bars at all times, that no disciplinary proceedings are pending against her in any jurisdiction and no discipline has previously been imposed on her in any jurisdiction. Ms. Brymer is familiar with the circumstances surrounding the above-captioned proceeding and applicable law, and her presence will serve the best interests of ORR Protection Systems, Inc. in this case.

7. If admitted pro hac vice, Ms. Brymer has represented that she will adhere to the disciplinary jurisdiction of this Court.

WHEREFORE, Applicant respectfully requests entry of the Order submitted herewith approving the admission, pro hac vice, of Laura Brymer, Esq. to represent ORR Protection Systems, Inc. as counsel in connection with the above-captioned proceeding.

Dated: July 31, 2025

Respectfully submitted,

/s/ Daniel C. Fleming
Daniel C. Fleming

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(a)	
WONG FLEMING, P.C. Daniel C. Fleming, NJ Bar No. 18631986 821 Alexander Road, Suite 200 P.O. Box 3663 Princeton, NJ 08543-3663 Tel.: (609) 951-9520 Fax: (609) 951-0270 <i>Counsel for Creditor and party-in-interest</i> ORR Protection Systems, Inc.	
In re Powin, LLC, <i>et al.</i> ¹ Debtors.	Chapter 11 Case No. 25-16137 (MBK) (Jointly Administered)

**CERTIFICATION OF LAURA BRYMER IN SUPPORT OF *PRO HAC VICE*
ADMISSION**

LAURA BRYMER certifies as follows:

1. I am an attorney with the law firm of Fultz Maddox Dickens PLC, 101 S. Fifth Street, 27th Floor, Louisville, Kentucky 40202. I submit this Certification in support of the Proposed Order admitting me to practice *pro hac vice* before this Court in the above-captioned matter on behalf of Creditor and party-in-interest ORR Protection Systems, Inc.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin Project LLC [1583]; (ii) Powin, LLC [0504]; (iii) PEOS Holdings, LLC [5476]; (iv) Powin China Holdings 1, LLC [1422]; (v) Powin China Holdings 2, LLC [9713]; (vi) Charger Holdings, LLC [5241]; (vii) Powin Energy Ontario Storage, LLC [8348]; (viii) Powin Energy Operating Holdings, LLC [2495]; (ix) Powin Energy Operating, LLC [6487]; (x) Powin Energy Storage 2, Inc. [9926]; (xi) Powin Energy Ontario Storage II LP, [5787]; and (xii) Powin Canada B.C. Ltd. [2239]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

2. I am a member in good standing of the following bars:

Jurisdiction	Admission Date	Address for Office Maintaining Roll of Members
Commonwealth of Kentucky (State Bar No. 95038)	10/19/12	514 W. Main Street Frankfort, Kentucky 40601
State of Indiana (State Bar No. 30989-10)	5/21/13	251 N. Illinois Street, Ste 1600 Indianapolis, Indiana 46204
USDC Western District of Kentucky	11/15/12	601 W. Broadway, Rm. 106 Louisville, Kentucky 40202
USDC Eastern District of Kentucky	12/21/12	101 Barr Street Lexington, Kentucky 40507
USDC Southern District of Indiana	12/11/12	46 East Ohio Street Indianapolis, Indiana 46204
USDC Northern District of Indiana	1/31/24	102 Federal Building 204 S. Main Street South Bend, Indiana 46601
USDC Eastern District of Michigan	1/19/24	231 W. Lafayette Blvd. Detroit, Michigan 48226
USDC Northern District of Illinois	4/3/13	219 S. Dearborn Street Chicago, Illinois 60604
USDC Southern District of Illinois	9/20/18	750 Missouri Avenue East Saint Louis, Illinois 62201
USDC Colorado	9/17/24	Alfred A. Arraj United States Courthouse 901 19th Street Denver, CO 80294-3589
USDC Middle District of Tennessee	11/5/24	Fred D. Thompson U.S. Courthouse and Federal Building 719 Church Street Nashville, TN 37203
USDC Eastern District of Wisconsin	4/21/16	U.S. Federal Building and Courthouse 517 E. Wisconsin Avenue Milwaukee, WI 53202
United States Court of Appeals – 7 th Circuit	12/10/21	Everett McKinley Dirksen United States Courthouse 219 S. Dearborn Street Chicago, IL 60604
United States Court of Appeals - 6th Circuit	11/13/12	100 East Fifth Street Cincinnati, Ohio 45202

3. Creditor and party-in-interest ORR Protection Systems, Inc. has requested that I act as its counsel in this matter, along with Wong Flemings, P.C. as local counsel.

4. All pleadings submitted on behalf of ORR Protection Systems, Inc. will be signed by local counsel.

5. There are no disciplinary proceedings currently pending against me in any jurisdiction, nor has discipline previously been imposed on me in any jurisdiction.

6. I will submit to this Court's jurisdiction for discipline.

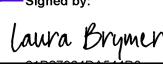
7. I will pay the Clerk's fee of \$25.00.

8. I will make all required payments to the New Jersey Lawyers' Fund for Client Protection.

9. I will abide by the Rules of this Court, including Local Rule 101.1(c).

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: July 31, 2025

Signed by:

Laura Brymer
61D27364DA544D0...

Laura Brymer

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

WONG FLEMING, P.C.
Daniel C. Fleming, NJ Bar No. 18631986
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Tel.: (609) 951-9520
Fax: (609) 951-0270
Counsel for Creditor and party-in-interest
ORR Protection Systems, Inc.

In Re:

Powin, LLC, et al.,
Debtors.

Case No.: 25-16137

Adv. No.: _____

Chapter: 11

Judge: Michael B. Kaplan

ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is **ORDERED**.

This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that Laura Brymer be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may sign and file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders. Unless otherwise permitted by the Court, local counsel must attend all hearings and proceedings before the Court, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$250.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, N.J. 07102
Attention: Pro Hac Vice Admissions

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.